



Order Filed on January 9, 2020  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

**Robertson, Anschutz & Schneid, PL**  
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Boca Raton, FL 33487  
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Telephone No.: 561-241-6901 (main)  
Attorneys for Secured Creditor

Harold Kaplan (HK0226)

In Re:

**Nancy M. Krimm,**

**Debtor.**

Case No.: 18-17590-ABA

Chapter: 13

Hearing Date: January 14, 2020

Judge: Andrew B. Altenburg Jr.

**AGREED ORDER RESOLVING SECURED CREDITOR'S MOTION FOR RELIEF  
FROM THE AUTOMATIC STAY**

The relief set forth on the following pages, numbered two (2) through three (3), is hereby  
ORDERED.

**DATED: January 9, 2020**

  
\_\_\_\_\_  
Honorable Andrew B. Altenburg, Jr.  
United States Bankruptcy Court

## Page 2

Secured Creditor: Nationstar Mortgage LLC d/b/a Champion Mortgage Company

Secured Creditor's Counsel: Robertson, Anschutz & Schneid, P.L.

Debtors' Counsel: Richard S. Hoffman, Jr., Esq.

Property Involved ("Collateral"): 601 E. Academy Street, Clayton, NJ 08312

Relief sought:

- ☒ Motion for relief from the automatic stay
- ☐ Motion to dismiss
- ☐ Motion for prospective relief to prevent imposition of automatic stay against the collateral by debtor's future bankruptcy filings

For good cause shown, it is **ORDERED** that Secured Creditor's Motion(s) is (are) resolved, subject to the following conditions:

1. Status of post-petition arrearages:
  - The Debtor has failed to maintain property taxes on the Collateral, forcing Secured Creditor to advance funds in the amount of \$8,881.50 for 2<sup>nd</sup> Quarter 2018 through and including 3<sup>rd</sup> Quarter 2019 taxes.

Funds Held In Suspense \$0.00

Total Arrearages Due \$8,881.50
2. Debtor must cure all post-petition arrearages, as follows:
  - A lump sum payment shall be made directly to Secured Creditor within 90 days of the entry of this Order in the amount of \$6,000.00.
  - Beginning on 01/01/2020, monthly cure payments shall be made in the amount of \$480.25 for 6 months to cure the remaining post-petition default of \$2,881.50.
  - Pursuant to the terms of Debtor's Reverse Mortgage, Debtor shall maintain home owner's insurance on the subject property, as well as make timely tax payments to the tax collector.
3. Payments to the Secured Creditor shall be made to the following address(es):
  - Lump sum payment: Champion Mortgage Company  
P.O. Box 619093  
Dallas, TX 75261

■ Monthly cure payment: Champion Mortgage Company  
P.O. Box 619093  
Dallas, TX 75261

4. In the event of Default:

■ Should the Debtor(s) fail to make any of the above captioned payments and/or should any tax payment or insurance premium become more than thirty (30) days late, or if Debtor(s) fails to comply with any terms of this Consent Order, counsel shall file a Certification of Default with the Court. A copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and the Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

■ In the event the Debtor(s) convert(s) to a Chapter 7 during the pendency of this bankruptcy case, the Debtor(s) shall cure all arrears within ten (10) days from the date of conversion in order to bring the loan contractually current. Should the Debtors fail to bring the loan contractually current, counsel shall file a Certification of Default with the Court, a copy of the Certification shall be sent to the Chapter 13 Trustee, Chapter 7 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

5. Award of Attorneys' Fees:

■ The Applicant is awarded attorney fees of \$350.00 and costs of \$181.00.

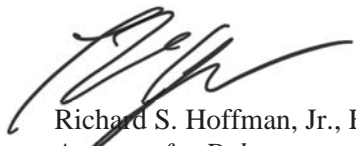
The fees and costs are payable:

■ Through the Chapter 13 plan.

☐ To the Secured Creditor within \_\_\_\_\_ days.

☐ Attorneys' fees are not awarded.

The undersigned hereby consent to the form and entry of the foregoing order.

  
Richard S. Hoffman, Jr., Esq.  
Attorney for Debtor  
Date: 1/7/2020

/s/ Harold Kaplan  
Harold Kaplan, Esq.  
Attorney for Secured Creditor  
Date: 1/8/2020